

EXHIBIT 4

1 question. Can you read the entire question back,
2 please.

3 (The previous question was read as follows:

4 "QUESTION: I'm not asking you that. I'm
5 asking you if Geden received the value of its equity, if
6 any, in the vessels listed in paragraph 36" --

7 "ANSWER: Yes."

8 "QUESTION: -- how is plaintiff
9 disadvantaged?")

10 A. They could not be disadvantaged if they receive
11 their hires.

12 Q. That's not my question, ma'am. My question is:
13 --

14 MR. GAITAS: I will object. I will object
15 because she answered. And that's the answer. You are
16 not getting the answer you want. That's too bad. She
17 answered.

18 A. I answered. I cannot answer to suppose and
19 suppose -- the reality is completely different. It's
20 not our concern if they have big plans. Our concern is
21 that they don't pay our money.

22 Q. Let the record show the witness is not
23 answering the question I've asked. How -- I'll ask
24 again to be absolutely clear.

25 If the vessels listed in paragraph -- if

1 Geden, when it sold the vessels listed in paragraph 36,
2 received the value of its equity in those vessels, how
3 is the plaintiff in this action disadvantaged by that
4 sale?

5 A. It could not be disadvantaged. If they pay our
6 money, we have no problem. We would have no problem
7 with this.

8 Q. So am I to understand, ma'am, that even though
9 the -- if the sale of these vessels, if Geden received
10 the value of its equity in these vessels, plaintiffs
11 could not have been disadvantaged by that sale. Is that
12 what you're saying?

13 A. Yes.

14 MR. GAITAS: I will object to the question
15 because it deals in hypotheticals of if they had
16 received. It is not on the table that they did receive.
17 It's if they have received. They might have received.

18 A. Suppose --

19 MR. GAITAS: Hypothetical.

20 MR. QUARTARO: That's the allegation.
21 That's the nature of the allegations in the complaint.
22 We're perfectly entitled to ask about that.

23 MR. GAITAS: It is hypothetical. It was
24 the allegations in the motions that it was an
25 arm's-length transaction.